

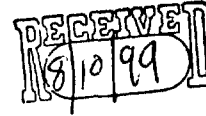
PREMIER DIRECT_{INC.}

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July 27, 1999

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, SW
Washington, D.C. 20204



RE: 21 U.S.C. Section 343(r)(6) Notification of Statements on Dietary Supplements

Dear Sir/Madam:

I hereby notify the Food and Drug Administration ("FDA") of the use of statements of nutritional support in the labeling of 4 Dragons Ginseng Complex, a dietary supplement. Premier Direct, Inc. is a manufacturer of 4 Dragons Ginseng Complex.

Statements Being Made in the Labeling of 4 Dragons Ginseng Complex

- (1) Siberian Ginseng: believed to play a crucial role in increasing physical endurance under competitive and stressful conditions.
- (2) Korean Ginseng: all-natural adaptogen which works mainly with your adrenal glands - your body's first line of defense against stress. This incredible herb can help your body in three ways: 1. By counteracting mental and physical fatigue; 2. By supporting metabolic balances when stressed; and 3. by promoting normal hormonal levels in your body.
- (3) American Ginseng: acts as a coolant for your respiratory and digestive system.
- (4) Red Chinese Ginseng: Long valued by eastern cultures as an energy tonic. Red Chinese Ginseng has been shown to increase physical and mental alertness while increasing your body's metabolic rate. It also helps fight fatigue because it spares glycogen utilization in muscles by increasing the use of fatty acids as energy. It also stimulates the sex glands and reduces stress by strengthening the adrenal glands.
- (5) Royal Jelly - This remarkable substance contains a powerhouse combination of B-Complex Vitamins, including B-6 and B-5, which play an important role in metabolism. Additionally, Royal Jelly helps to stimulate the body's adrenal glands ... thus promoting enhanced vitality.

To the best of my knowledge, and based upon information and belief present at the time of executing this notice, I certify that this information is accurate and complete and Premier Direct, Inc. possesses substantiation that the statements are truthful and not misleading.

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